

Steven G. Rosales  
Attorney at Law: 222224  
Law Offices of Lawrence D. Rohlfing  
12631 East Imperial Highway, Suite C-115  
Santa Fe Springs, CA 90670  
Tel.: (562)868-5886  
Fax: (562)868-5491  
E-mail steven.rosales@rohlflinglaw.com

Attorneys for Plaintiff JOESHANA CARD

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

JOESHANA CARD,	)	Case No.: CV 15-5201 MEJ
	)	
Plaintiff,	)	STIPULATION TO EXTEND
	)	BRIEFING SCHEDULE
vs.	)	
	)	
CAROLYN COLVIN, Acting	)	
	)	
Commissioner of Social Security,	)	
	)	
Defendant	)	

TO THE HONORABLE MARIA ELENA JAMES, MAGISTRATE JUDGE  
OF THE DISTRICT COURT:

Plaintiff Joeshana Card (“Plaintiff”) and defendant Carolyn Colvin, Acting Commissioner of Social Security (“Defendant”), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff’s Motion for Summary Judgment or Remand to July 1, 2016; and that Defendant shall have until August 1, 2016, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due August 15, 2015.

1 Despite Counsel for plaintiff anticipating the prior request for an extension  
2 to be his last, Counsel requires more time as a result of the impact of unanticipated  
3 medical procedures to treat his spouses' terminal illness, including the unfortunate  
4 news on June 2, 2016 of a second independent cancer diagnosis of multiple  
5 myeloma in addition to the existing stage 4 breast cancer. Counsel for plaintiff  
6 does not anticipate this extraordinary request for more time to become the rule and  
7 recognizes it is the exception and sincerely apologizes to the court for any  
8 inconvenience this may have had upon it or its staff.

9  
10 DATE: June 22, 2016

Respectfully submitted,

11 LAW OFFICES OF LAWRENCE D. ROHLFING

12 /s/ *Steven G. Rosales*

13 BY: \_\_\_\_\_

Steven G. Rosales

14 Attorney for plaintiff

15 DATED: June 22, 2016

BRIAN J. STRETCH

16 United States Attorney

17  
18 \*/S/- Henry Chi

19 \_\_\_\_\_  
20 Henry Chi

21 Special Assistant United States Attorney

Attorney for Defendant

22 [\*Via email authorization]  
23  
24  
25  
26

1 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to  
2 and including July 1, 2016, in which to file Plaintiff's Motion for Summary  
3 Judgment or Remand; Defendant may have an extension of time to August 1, 2016  
4 to file her opposition, if any is forthcoming. Any reply by plaintiff will be due  
5 August 15, 2016.

6 IT IS SO ORDERED.

7 DATE: June 28, 2016



---

THE HONORABLE MARIA ELENA JAMES  
UNITED STATES MAGISTRATE JUDGE